

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Amendment of Part 15 of the ) RM No. 8609  
Commission's Rules to Reduce the )  
Spectral Occupancy of Frequency )  
Hopping Spread Spectrum Devices )

To: The Commission

COMMENTS OF ITRON, INC.

Itron, Inc. ("Itron") submits these comments regarding the Petition for Rulemaking filed by Spectralink in the above-referenced proceeding. Itron is the world leader in RF-based automatic meter reading systems used by gas, electric, and water utility companies. The meter transponders used by Itron systems, which operate under Part 15 of the Commission's rules, use the 902-928 MHz band. In its petition, Spectralink has proposed two changes to the Commission's Part 15 rules that would reduce the spectrum occupancy of Part 15 frequency hopping spread spectrum devices. For the reasons outlined below, Itron supports Spectralink's petition.

**Discussion**

In its petition, Spectralink proposes two changes to the Commission's Part 15 rules. First, Spectralink proposes that the number of frequency hopping channels required under Section 15.247(a)(1)(i) should be reduced from 50 to 25. Second, and

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assuming that its first proposal is adopted, Spectralink requests that the maximum authorized transmitter power for frequency hopping devices using fewer than 50 channels should be reduced to 500 mW, thus reducing the power spectrum density for these devices and minimizing the interference potential to other users of the band. Spectralink maintains that these changes will reduce the spectrum occupancy of Part 15 frequency hopping devices and thereby maximize spectrum efficiency in the increasingly congested 902-928 MHz band.

Itron supports Spectralink's petition. As a result of the Commission's recent decision to allocate the entire 902-928 MHz band for Location and Monitoring Services ("LMS"),<sup>1</sup> the spectral efficiency of devices operating in this band is of paramount importance. Spectralink's proposal will provide flexibility to Part 15 manufacturers to design and deploy devices that require less spectrum. This, in turn, will facilitate coexistence of Part 15 devices and other services in the 902-928 MHz band.

Itron suggests a slight modification to the proposed rule change. To further enhance design flexibility and promote the development of new, spectrum-efficient Part 15 devices, the Commission should provide for a graded power curve based on the number of frequencies that a frequency hopping spread spectrum device uses. Under Spectralink's proposal, any device using fewer than 50 hopping frequencies (e.g., 49) would be required to reduce power to 500 mW. Itron suggests that power reductions should be correlated linearly to the number of frequencies on which a device hops. That is, as the number of frequencies on which a device hops increases from 25 to 50, the maximum permissible transmitter power should increase concomitantly from 500 mW to 1 watt. This additional design flexibility would

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<sup>1</sup> Amendment of Part 90 of the Commission's Rules to Adopt Regulations for Automatic Vehicle Monitoring Systems, Report and Order, PR Docket No. 93-61 (rel. Feb. 6, 1995).

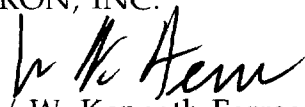
allow the market to determine the optimum technical specifications for any given technology, and would encourage Part 15 manufacturers to experiment with new configurations.

### Conclusion

For the reasons set forth herein, Itron supports the petition for rulemaking filed by Spectralink, and urges the Commission adopt the proposed rule change with the modification specified above.

Respectfully submitted,

ITRON, INC.

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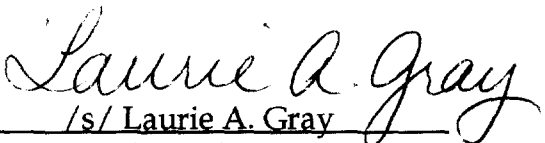
April 7, 1995

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments was sent by first-class mail, postage prepaid, this 7th day of April, 1995, to each of the following:

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/s/ Laurie A. Gray  
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